

VIRGINIA

IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

MANDY ANNE TRUMAN

Plaintiff,

V.

Case No.: CL20-3265-7

**STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY**

Defendant.

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST SET OF INTERROGATORIES
AND REQUESTS TO PRODUCTION OF DOCUMENTS TO PLAINTIFF**

Plaintiff, Mandy Truman, by counsel, for her answers to Defendant State Farm Mutual Automobile Insurance Company's First Interrogatories and Requests for Production of Documents states as follows:

GENERAL OBJECTIONS

Plaintiff objects to each and every interrogatory and request to the extent that it requests information protected by the attorney-client privilege and/or work product doctrine. Plaintiff further objects to each and every definition, instruction, and interrogatory to the extent that it requests information beyond the scope required by applicable rules.

1. The Plaintiff objects to any of the Defendants Interrogatories that seek information beyond the scope of discovery permitted by Rules 4:8 and 4:9 of the Supreme Court of Virginia.
2. The Plaintiff objects to the definitions and instructions to the extent that such definitions and instructions are not provided for in the Rules of the Supreme Court of Virginia.
3. The Plaintiff objects to the Defendant's Interrogatories to the extent that they

contain more than the permissive number of interrogatories, including parts and sub-parts, in violation of the limitation imposed by the Rules of the Supreme Court of Virginia.

4. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, her agents, representative and attorneys, unless privileged. Such knowledge may or may not be known to the Plaintiff other than provided.

5. These answers will be supplemented in accordance with Rule 4:8 of the Rules of the Supreme Court of Virginia.

ANSWERS TO INTERROGATORIES

1. Identify the name, present residence and business address(es), social security number, date of birth, and telephone number(s) of the person(s) answering / responding to these Interrogatories, including any person(s) assisting with any of the answers / responses.

ANSWER:

Mandy Anne Truman
6506 Kensington Ave., Richmond, VA 23226

[REDACTED]
[REDACTED]
[REDACTED]

2. Describe in detail and state the basis for the total amount of damages, expenses, fees and costs you are claiming against State Farm Mutual Automobile Insurance Company, including the manner and method by which these damages were calculated, identifying in your Answer all persons with knowledge of same and all documents or records relating to same, including the identity of the custodian of the documents or records. Please include in your response a detailed, itemized statement, giving amounts or records. Please include in your response a detailed, itemized statement, giving amounts, names and addresses of all health care

providers, employers, etc., in each instance, of all special damages, financial losses, fees and/or expenses, including lost wages, claimed by you.

ANSWER:

The Plaintiff's special damages for her 2013 motor vehicle collision are as follows:

West End Anesthesia Group 5801 Bremo Road Richmond, VA 23226	\$7,078.00
Tuckahoe Orthopaedics PO Box 71690 Richmond, VA 23255	\$29,698.00
St. Mary's Ambulatory Surgery Center 1501 Maple Avenue, Suite 300 Richmond, VA 23226	\$12,587.34
St. Mary's Hospital 5801 Bremo Road Richmond, VA 23226	\$403,829.97
Richmond Emergency Physicians PO Box 79013 Baltimore, MD 21279	\$600.00
Sheltering Arms 8254 Atlee Road Mechanicsville, VA 23116	\$3,034.00
Sentara Medical Center PO Box 79603 Baltimore, MD 21279	\$2,517.01
Professional Anesthesia Group 1302 Rising Ridge Road, Unit 1 Mt. Airy, MD 21771	\$3,240.00
Prince William Emergency Medical PO Box 34933 Alexandria, VA 22334	\$465.00

Potomac Radiology PO Box 791038 Baltimore, MD 21279	\$40.00
Performance PT 9130 Dickey Drive Mechanicsville, VA 23116	\$8,813.00
Paul L. Valentine O & P 2139 Staples Mill Road Richmond, VA 23230	\$1,973.20
Compression Solutions 1638 S. Main Street Tulsa, OK 74119	\$725.00
Commonwealth Radiology 1508 Willow Lawn Drive, Ste. 117 Richmond, VA 23230	\$370.00
Commonwealth Pain Specialists PO Box 8310 Roanoke, VA 24014	\$3,178.00
SME Inc USA PO Box 15209 Wilmington, NC 28408	\$58.05
Total Medical Damages	\$478,206.57
Prescriptions	\$1,627.83
Lost wages	\$24,948.84
Total Special Damages	\$504,783.24

Defendant State Farm, despite requests, paid only \$21,293.51 of the previously submitted bills. The Explanation of Reviews are attached hereto in Bates Nos. Truman000001-Truman01015.

3. Describe in detail and state the basis for each and every injury, whether physical, mental, emotional, occupational, or otherwise, including any present complaints, residual effects, and any alleged permanent injuries or disabilities, which you claim to have sustained and expect to prove at the trial of this action as damages, identifying in your Answer all persons with knowledge of each such injury and all documents or records relating to each such injury, including the identity of the custodian of the documents or records. If any such person is an expert witness or a health care provider, please state the subject matter on which the expert or health care provider is expected to testify at trial and give a complete description of the substance of the facts and opinions to which the expert or health care provider is expected to testify, providing a detailed summary of the grounds for each such opinion.

ANSWER:

Objection. Plaintiff objects to this Interrogatory to the extent that it calls for a medical opinion, which Plaintiff is not qualified to give. The Plaintiff has not yet made a determination as to which expert witnesses may be called to testify at the time of trial. Plaintiff will provide this information in accordance with this Court's Pretrial Scheduling Order and/or the Rules of the Supreme Court of Virginia. Without waiving said objections, or intending this response to be all-inclusive, Plaintiff suffered a labral tear, radiculitis, lumbago, cervicalgia, trauma induced kyphosis, contusion, neck sprain, and instability. The pain from her neck and right shoulder was described as sharp, dull, stabbing, throbbing, aching, burning, and constant. She had neck stiffness, upper extremity weakness, and muscle spasms and her right elbow would lock and catch. On December 11, 2013, Plaintiff had an arthroscopic anterior and posterior capsulorrhaphy procedure done on her right shoulder. On March 5, 2014, she had manipulation under anesthesia done on her right shoulder due to her continued limitation in motion and the

severity of her stiffness after her first procedure in 2013. On April 8, 2015, due to failed conservative management of her back pain, Plaintiff underwent a posterior spinal fusion from T2 to L2 with low spin segmental spinal instrumentation, autogenous and freeze dried bone graft. In addition, she also had several cervical facet block injections. Plaintiff's medical records are attached hereto as Bates Nos. Truman00001-Truman01015.

4. Identify any and all entities/companies providing health insurance benefits to you and to which claims have been made for any and all treatment(s) you allege to have received as result of the injury(ies) complained of in the Complaint, including in your answer the name and address of each such entity/company, the policy holder, and the policy number.

ANSWER:

Objection. This Request seeks collateral source information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection, or intending this response to be all-inclusive, Plaintiff received short term disability benefits from Unum Life Insurance Company of America, claim number: [REDACTED], policy number: [REDACTED]. Plaintiff also had Anthem BCBS, [REDACTED].

5. State the name and addresses of all health care providers who have examined, treated or admitted you as a result of the injury(ies) complained of in the Complaint, describing in detail for each such provider the subject matter and basis for each such examination, treatment and/or admission.

ANSWER:

Chester H. Sharps, MD
Jed S. Vanichkachorn, MD
William R. Beach, MD
Tuckahoe Orthopaedics
PO Box 71690
Richmond, VA 23255

William Beach, MD
Mark Floyd, MD
Scott Janus, DO
St. Mary's Ambulatory Surgery Center
1501 Maple Avenue, Suite 300
Richmond, VA 23226

Jennifer M. Hoyt, MD
Frank Stoneburner, Jr., MD (Radiologist)
Joseph Gill, MD
Karen Killeen, MD
Ashton Goldman, MD (Orthopedic Surgery)
Jason Hull, MD (Orthopedic Surgery)
Amy Greene, OT
Cynthia Scola, PT
Carla Viray, PT
St. Mary's Hospital
5801 Bremo Road
Richmond, VA 23226

Caroline Betz, PT
Sheltering Arms/SME Spine & Sport Ctr.
8254 Atlee Road
Mechanicsville, VA 23116

Alan Lo, MD
Norbertina Banson, MD (Radiologist)
Sentara Medical Center
PO Box 79603
Baltimore, MD 21279

J. Smith
Prince William Emergency Medical
PO Box 34933
Alexandria, VA 22334

Richmond Poyner, PT
Jennifer Hyde, PT
Performance Physical Therapy
9130 Dickey Drive
Mechanicsville, VA 23116

Paul L. Valentine O & P
2139 Staples Mill Road
Richmond, VA 23230

Stephen P. Long, MD
Megan Wind, NP
Commonwealth Pain Specialists
PO Box 8310
Roanoke, VA 24014

Robert A. Smith, MD, PA
Orthopedic Surgeon, FAAOS, CIME
1298 Cronson Boulevard, #203
Crofton, MD 21114

6. Describe in detail, if applicable, any preexisting / previous injury or limitation, similar condition and/or any aching, pain or discomfort in any of the parts of the anatomy allegedly injured as a result of the incident complained of in the Complaint, identifying in your Answer all persons with knowledge of same and all documents or records relating to same, including the identity of the custodian of the documents or records.

ANSWER:

At an early age, Plaintiff was diagnosed with spina bifida occulta in the lower thoracic spine. Plaintiff was involved in a motor vehicle accident on January 31, 2012, and sustained a cervical and back strain. Plaintiff's injuries from her 2012 motor vehicle collision had completely resolved prior to the 2013 subject accident. Plaintiff's 2012 and 2013 medical records are attached hereto which fully set forth the complaints, prognosis, diagnosis, and general opinions as to the Plaintiff's injuries and permanency.

7. Further responding to the foregoing Interrogatory, if you contend that a previous injury, disease or condition has been aggravated and/or accelerated as a result of the accident complained of in the Complaint, please describe in detail all facts which support such contention, including a detailed description of the nature and extent to which such injury, disease or condition has been so aggravated and/or accelerated, and identifying in your Answer all persons

with knowledge of these facts and all documents or records relating to these facts, including the identity of the custodian of the documents or records.

ANSWER:

Objection. Plaintiff objects to this Interrogatory to the extent that it calls for a medical opinion, which Plaintiff is not qualified to give. The Plaintiff has not yet made a determination as to which expert witnesses may be called to testify at the time of trial. Plaintiff will provide this information in accordance with this Court's Pretrial Scheduling Order and/or the Rules of the Supreme Court of Virginia. Without waiving said objection, or intending this response to be all-inclusive, Plaintiff states as follows: see Dr. Chester Sharps' questionnaire regarding Plaintiff's medical condition, permanency, and exacerbation of her injuries. Plaintiff's had several x-rays taken of her spine after her 2013 accident which revealed a 68° severe thoracic kyphosis which was trauma induced. Dr. Sharps ordered a brace to correct the curvature and required surgery to stabilize the spine. These medical records are also attached hereto as Bates Nos. Truman00001-Truman01015.

8. Please describe in detail any and all medical conditions you have had, and list the names and addresses of all health care providers who have seen or treated you for any purpose whatsoever, during the ten (10) year period preceding the filing of your Answers to these Interrogatories, describing the diagnosis and/or the purpose of each such condition / treatment / health care provider.

ANSWER:

Objection. Plaintiff objects to this Interrogatory as overly broad and unduly burdensome as it seeks every healthcare encounter of the Plaintiff, to include cuts, fevers, scrapes, bumps and

the like for the past ten years. Without waiving said objection, or intending this response to be all-inclusive, see response to Interrogatory number 5 and the additional following providers:

Laura Burijon, MD
Mechanicsville Medical Center
7571 Cold Harbor Road
Mechanicsville, Virginia 23111

George Washington University Hospital
900 23rd Street NW
Washington, District of Columbia 20037

OrthoVirginia, Inc.
8200 Meadowbridge Road, Suite 200
Mechanicsville, Virginia 23116

Memorial Regional Medical Center
8260 Atlee Road
Mechanicsville, Virginia 23116

St. Mary's Hospital
5801 Bremon Road
Richmond, Virginia 23226

Robert S. Adelaar, MD
VCU Orthopaedic Medicine
417 North 11th Street
Richmond, VA 23298

Thomas P. Loughran, MD
VCU Sports Medicine
1300 West Broad Street, Suite 113
Richmond, VA 23284

Patient First
7238 Mechanicsville Turnpike
Mechanicsville, VA 23111

Virginia Physicians for Women
5875 Bremon Road, Suite 201
Richmond, VA 23226

Henrico Doctors Hospital
1602 Skipwith Road
Richmond, VA 23229

Richmond Eye Associates
7575 Cold Harbor Road, Suite 1E
Mechanicsville, VA 23111

Neurological Associates
7607 Forest Avenue, Suite 300
Richmond, VA 23229

9. For each and every medical expense and/or bill which you claim is covered and/or for which you seek payment under the subject State Farm insurance policy, please identify and describe the amount "incurred" (as defined by Va. Code §38.2-2201(A)(3)) for each such medical expense and/or bill.

ANSWER:

West End Anesthesia Group 5801 Bremo Road Richmond, VA 23226	\$7,078.00
Tuckahoe Orthopaedics PO Box 71690 Richmond, VA 23255	\$29,698.00
St. Mary's Ambulatory Surgery Center 1501 Maple Avenue, Suite 300 Richmond, VA 23226	\$12,587.34
St. Mary's Hospital 5801 Bremo Road Richmond, VA 23226	\$403,829.97
Richmond Emergency Physicians PO Box 79013 Baltimore, MD 21279	\$600.00
Sheltering Arms 8254 Atlee Road Mechanicsville, VA 23116	\$3,034.00
Sentara Medical Center PO Box 79603 Baltimore, MD 21279	\$2,517.01

Professional Anesthesia Group 1302 Rising Ridge Road, Unit 1 Mt. Airy, MD 21771	\$3,240.00
Prince William Emergency Medical PO Box 34933 Alexandria, VA 22334	\$465.00
Potomac Radiology PO Box 791038 Baltimore, MD 21279	\$40.00
Performance PT 9130 Dickey Drive Mechanicsville, VA 23116	\$8,813.00
Paul L. Valentine O & P 2139 Staples Mill Road Richmond, VA 23230	\$1,973.20
Compression Solutions 1638 S. Main Street Tulsa, OK 74119	\$725.00
Commonwealth Radiology 1508 Willow Lawn Drive, Ste. 117 Richmond, VA 23230	\$370.00
Commonwealth Pain Specialists PO Box 8310 Roanoke, VA 24014	\$3,178.00
SME Inc USA PO Box 15209 Wilmington, NC 28408	\$58.05

10. Identify all persons who have knowledge of any fact or circumstance relating in any way to the claims and/or defenses asserted in this action, describing in detail for each such person the subject matter and substance of his/her knowledge.

ANSWER:

Objection. The Interrogatory seeks to invade the mental impressions and trial preparation strategies of counsel. The Plaintiff has not yet made a determination as to which witnesses may be called to testify at the time of trial. Plaintiff will provide this information in accordance with this Court's Pretrial Scheduling Order and/or the Rules of the Supreme Court of Virginia. Without waiving said objection, or intending this response to be all-inclusive, Plaintiff states as follows:

Plaintiff
Defendant Joshua Isaman
State Farm adjusters for the 2013 medpay claim
Bryn Swartz, Plaintiff's husband

Chester H. Sharps, MD
Jed S. Vanichkachorn, MD
William R. Beach, MD
Tuckahoe Orthopaedics
PO Box 71690
Richmond, VA 23255

William Beach, MD
Mark Floyd, MD
Scott Janus, DO
St. Mary's Ambulatory Surgery Center
1501 Maple Avenue, Suite 300
Richmond, VA 23226

Jennifer M. Hoyt, MD
Frank Stoneburner, Jr., MD (Radiologist)
Joseph Gill, MD
Karen Killeen, MD
Ashton Goldman, MD (Orthopedic Surgery)
Jason Hull, MD (Orthopedic Surgery)
Amy Greene, OT
Cynthia Scola, PT
Carla Viray, PT
St. Mary's Hospital
5801 Bremo Road
Richmond, VA 23226

Caroline Betz, PT
Sheltering Arms/SME Spine & Sport Ctr.
8254 Atlee Road
Mechanicsville, VA 23116

Alan Lo, MD
Norbertina Banson, MD (Radiologist)
Sentara Medical Center
PO Box 79603
Baltimore, MD 21279

J. Smith
Prince William Emergency Medical
PO Box 34933
Alexandria, VA 22334

Richmond Poyner, PT
Jennifer Hyde, PT
Performance Physical Therapy
9130 Dickey Drive
Mechanicsville, VA 23116

Paul L. Valentine O & P
2139 Staples Mill Road
Richmond, VA 23230

Stephen P. Long, MD
Megan Wind, NP
Commonwealth Pain Specialists
PO Box 8310
Roanoke, VA 24014

Robert A. Smith, MD, PA
Orthopedic Surgeon, FAAOS, CIME
1298 Cronson Boulevard, #203
Crofton, MD 21114

11. If you or anyone else to your knowledge has heard any statements made by an agent, representative or employee of State Farm, or by any person identified in your Answers to the preceding Interrogatories, relating in any way to the claims or defenses asserted in this action, then as to each such statement please identify the person(s) who made the statement(s),

the date and location where the statement was made, the person(s) who heard the statement(s), and describe the substance and subject matter of each such statement(s).

ANSWER:

Plaintiff is not aware of any such statements.

12. If you or anyone acting on your behalf knows of any transcripts, tapes, writings or other tangible record of any statement made by an agent, representative or employee of State Farm, or by any person identified in your Answers to the preceding Interrogatories, relating in any way to the claim(s) or defense(s) asserted in this action, please identify each such transcript, tape, writing or other tangible record and the name, address and telephone number of its custodian, or produce the record instead.

ANSWER:

Plaintiff cannot recall whether or not if she gave a recorded statement when she made her claim to get her vehicle fixed.

13. Please identify all persons (including all treating health care providers) who the Plaintiff expects to call as an expert witness to testify at any deposition, hearing or trial in this case and for each such person, please identify, state and describe the name, address, occupation, and area of expertise of each such expert; the subject matter and substance of all facts to which each such expert is expected to testify; all opinions held by each such expert, and the grounds and basis for each such opinion.

ANSWER:

Objection. The Plaintiff has not yet made a determination as to which expert witnesses may be called to testify at the time of trial. Plaintiff will provide this information in accordance with this Court's Pretrial Scheduling Order and/or the Rules of the Supreme Court of Virginia.

Without waiving said objection, or intending this response to be all-inclusive, see response to Interrogatory no. 5.

14. If you have made any claims seeking compensation or damages for person injury against any person / entity, or have made any claim for workers' compensation, then state the name, address and telephone number of the persons / entities involved, the date of each such accident, the applicable insurance carriers and the insurance claim numbers.

ANSWER:

Objection. This Request seeks collateral source information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection, or intending this response to be all-inclusive, Plaintiff states as follows:

Mandy Truman v. Joseph DeFrancis
Chubb Group of Insurance Companies
Resolved - 01/31/2012

Mandy Truman v. Wendell Franklin
Avis Budget Group
Resolved - 08/02/2013

15. If you have been or are a party to any other lawsuit, please state the style of each action, the date on which each action was filed, the court in which each was filed, and the disposition thereof.

ANSWER:

Objection. This Request seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving said objection, or intending this response to be all-inclusive, Plaintiff states as follows:

Mandy Truman v. Joshua Isaman
Circuit Court for the City of Richmond
Active - 06/07/2018

RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All documents and things that relate or refer to any losses, damages, expenses and/or injuries claimed to have been sustained by you, as alleged in the Complaint.

RESPONSE:

Objection. This Request seeks information subject to the attorney work product doctrine. See Plaintiff's medical records and bills attached hereto, Bates Nos. Truman00001-Truman01015.

2. All documents and things that you identified in any of your responses to the Interrogatories served contemporaneously herewith.

RESPONSE:

See Plaintiff's medical records, bills, insurance policies, and lost wage documentation attached hereto as Bates Nos. Truman00001-Truman01015.

3. All documents and things that you used in any way to provide responses to the Interrogatories served contemporaneously herewith.

RESPONSE:

Objection. This Request seeks information protected by the attorney-client privilege and subject to attorney work product doctrine. Without waiving said objection, or intending this response to be all-inclusive, see all documents produced as Bates Nos. Truman00001-Truman01015.

4. All documents and things that relate in any way to the claims and/or defenses asserted by the parties to this action.

RESPONSE:

Objection. This Request seeks to invade the mental impressions and trial preparation strategies of counsel and invades attorney-client privilege. Without waiving said objection, or

intending this response to be all-inclusive, see Plaintiff's medical records, bills, and insurance policy for 2013, attached hereto as Bates Nos. Truman00001-Truman01015.

5. All notes, transcripts or recordings of any type of any statements given by State Farm (including any agents, employees or representatives of State Farm), any party to this action, and any person or entity identified in your responses to the Interrogatories served contemporaneously herewith.

RESPONSE:

Plaintiff is not in possession of any such materials.

6. All documents and things that you intend to use as evidence or introduce as an exhibit at any deposition or trial in this action.

RESPONSE:

Objection. This Request seeks the mental impressions and trial preparation strategies of counsel. Plaintiff will disclose this information 15 days prior to trial in accordance with the Pretrial Scheduling order.

7. All correspondence, memoranda, writings, e-mails, statements or other written documents or records that you sent to or received from State Farm (including its attorneys, insurers, representatives, agents and employees) relating in any way to the claim(s) giving rise to this action or to the events or circumstances described in the Complaint.

RESPONSE:

See attached letters sent from State Farm regarding the August 2, 2013 collision.

8. All correspondence, memoranda, writings, e-mails, statements or other written documents or records that you sent to or received from any person or entity identified or

disclosed in your Answers to Interrogatories relating in any way to the claim(s) giving rise to this action or to the events or circumstances described in the Complaint.

RESPONSE:

Objection. This Request seeks information protected by the attorney-client privilege.

9. A complete copy of each and every settlement agreement, release, settlement check and all correspondence, documents and records pertaining to any compromise and/or settlement of any claim (including all claims of personal injury and/or property damage) reached between Plaintiff and any other person involved in the subject motor vehicle accident and/or that person's liability insurer.

RESPONSE:

See attached settlement agreement release.

10. All documents and things reviewed by or relied upon by any expert witness(es) (including treating doctors) whom you expect to use or call as a witness at any deposition, hearing or trial in this action, and all reports prepared by each such expert.

RESPONSE:

Objection. The Plaintiff has not yet made a determination as to which expert witnesses may be called to testify at the time of trial. Plaintiff will provide this information in accordance with this Court's Pretrial Scheduling Order and/or the Rules of the Supreme Court of Virginia.

11. Any and all contracts or agreements between the Plaintiff and any person or entity identified in your answers to the Interrogatories served contemporaneously herewith, together with any amendments or modifications to such contracts or agreements, relating in any way to (i) the claim(s) giving rise to this action and/or the injuries or treatment alleged in the Complaint.

RESPONSE:

See Plaintiff's 2013 State Farm Renewal Policy attached hereto.

12. All documents and things which set forth, document, discuss, calculate, evidence, quantify, substantiate, or relate in any way to the damages, losses, injuries, fees and/or expenses claimed by Plaintiff in this action.

RESPONSE:

See Plaintiff's medical bills, medical records, and lost wages attached hereto as Bates Nos. Truman00001-Truman01015.

13. All documents and things which set forth, document, discuss, calculate, evidence, quantify, substantiate or relate in any way to any past or future medical expenses for which Plaintiff is seeking recovery in this lawsuit.

RESPONSE:

See Plaintiff's medical records, medical bills, and lost wages attached hereto as Bates Nos. Truman00001-Truman01015.

14. A complete copy of all medical statements, bills and/or invoices which you claim are covered, and/or for which you seek payment, under the subject State Farm insurance policy, and which show the amounts "incurred" (as defined by Va. Code §38.2-2201(A)(3)) - including all contractual adjustments, write-offs, and reductions to such bills - for all medical treatment which you claim was a result of the subject motor vehicle accident.

RESPONSE:

See Plaintiff's medical bills attached hereto as Bates Nos. Truman00001-Truman01015.

15. All documents and things, not already produced in response to the foregoing Requests, which support or relate in any way to the allegations, demands and/or prayer for damages contained in the Complaint.

RESPONSE:

Objection. This Request seeks to invade attorney-client privilege, attorney work product, and the mental impressions and trial preparation strategies of counsel. See attached medical records, medical bills, and other documents attached as Bates Nos. Truman00001-Truman01015.

16. A complete copy of all insurance contracts / policies mentioned in the Complaint.

RESPONSE:

See attached Plaintiff's 2013 State Farm Renewal Policy. Defendant is in possession of Plaintiff's 2013 State Farm insurance contract.

17. A complete copy of all insurance contracts / policies which form the basis for the claims alleged in the Complaint.

RESPONSE:

See attached Plaintiff's 2013 State Farm Renewal Policy. Defendant is in possession of Plaintiff's 2013 State Farm insurance contract.

Respectfully submitted,
MANDY ANNE TRUMAN

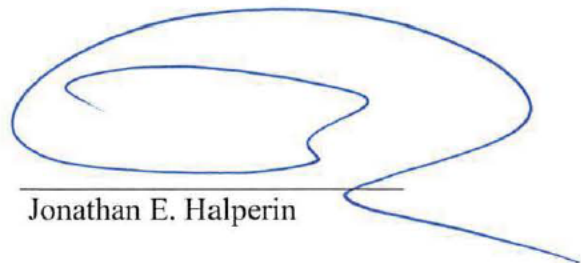
By: 
Counsel

Jonathan E. Halperin (VSB No. 32698)
Andrew Lucchetti (VSB No. 86631)
Halperin Law Center, LLC
5225 Hickory Park Drive, Suite B
Glen Allen, VA 23059
Phone: (804) 527-0100
Facsimile: (804) 597-0209
jonathan@hlc.law
andrew@hlc.law

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of September, 2020, a true and correct copy of the foregoing Plaintiff's Answers to Defendant's First Interrogatories and Requests for Production of Documents to Plaintiff will be sent via First Class Mail, postage pre-paid, and by electronic mail, to the following:

Alexander S. de Witt, Esq.
FREEBORN & PETERS LLP
901 East Byrd Street, Suite 950
Richmond, VA 23219
Phone: (804) 644-1300
Direct: (804) 799-7790
Facsimile: (804) 644-1354
E-mail: adewitt@freeborn.com
Counsel for Defendant



Jonathan E. Halperin